



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

**SEP 15 2010**

Reply To: OWW-130

Ed Abbasi, P.E.  
Water Quality Program  
Washington State Department of Ecology  
Northwest Regional Office  
3190 – 160<sup>th</sup> Ave. SE  
Bellevue, WA 98008-5452

RE: Seattle Iron & Metals Corporation; NPDES Permit No. WA-003196-8

Dear Mr. Abbasi:

EPA appreciates the opportunity given to us by Ecology to review and comment on the Seattle Iron & Metals Corporation (SIM) Stormwater Quality Report, Stormwater Engineering Report, and Mixing Zone Report. EPA's comments on the Mixing Zone Report were transmitted to Ecology via email on June 15, 2010. Detailed comments on the Stormwater Quality Report reviewed by Kris Flint and Stormwater Engineering Report reviewed by Lisa Olson are enclosed.

On July 7, 2010, EPA sent Ecology a letter acknowledging Ecology's plan to approve the reports on a conditional basis so SIM could begin construction of site improvements during the current construction season. EPA recommended language for the conditional approval transmittal letter to SIM based on the issues observed during our review of the reports. EPA received a copy of Ecology's July 15, 2010 conditional approval letter to SIM, which contained the recommended language.

The enclosed comments identify the issues EPA found during our review, many of which are based on concerns about source control. The identified source control issues relate to discharges from this facility contributing to contamination in the Lower Duwamish Waterway which will require cleanup. As noted in our July 7, 2010, letter, EPA believes that the issues identified in our comments warrant a second round of engineering analysis to be required before and/or within the reissued permit to address all sources of industrial wastewater discharging from SIM's site, the effect of atmospheric deposition at the site, and all potential source control issues at the site. An important part of this engineering analysis will be to analyze the impacts of all of these sources on Lower Duwamish Waterway (LDW) water and sediments. EPA also believes that collection of source control data to inform the second round of engineering analysis

should be performed and submitted as part of SIM's NPDES permit application prior to reissuance of the permit.

EPA appreciates partnering with Ecology on the nexus between NPDES and sediment cleanups on the LDW. EPA's future reviews of Ecology's NPDES permits discharging to the LDW will focus upon source control issues.

If you have any questions, please call Kris Flint at (206) 553-8155 or Lisa Olson at (206) 553-0176.

Sincerely,



Michael J. Lidgard, Manager  
NPDES Permits Unit

Enclosures

cc: Kevin Fitzpatrick, Water Quality Section Manager, Ecology NWRO  
Jerry Shervey, Ecology NWRO